

Intelligence MEMOS



From: Gregg Lintern
To: Housing Watchers
Date: December 11, 2024
Re: **CANADA'S HOUSING CRISIS IS ABOUT MORE THAN JUST SUPPLY**

Canada's housing crisis isn't just about interest rates, land speculation, or supply. It's also about rigid zoning laws, fragmented government roles, and insufficient support for diverse and affordable housing options.

I recently presented at the C.D. Howe Institute's [conference on housing policy](#), where we explored how the very systems meant to build communities now hinder them. Fixing the foundation of the housing system begins with zoning.

While Canada's zoning laws remain overly prescriptive, often categorizing land use too narrowly and ignoring the needs of modern mixed-use communities, it's starting to change.

Moving toward form-based zoning, which emphasizes buildings' physical shape and scale rather than outdated land-use categories, and adopting as-of-right zoning that allows property development without site-by-site public hearings will accommodate a wider range of housing types by default.

This shift should remove outdated mandates like minimum parking requirements, expand options for multi-tenant housing, garden suites, and multiplexes, and allow for taller structures, such as six stories along major streets and taller midrise buildings in areas where growth is well-supported and transit is nearby.

Overall, zoning reform alone isn't enough. Let's look at Toronto, where I was Chief Planner and Executive Director of the City Planning Division.

On specific projects, the city has reduced the review process for zoning changes from six to two weeks in 80 percent of recent applications. This only addresses part of the challenge.

Toronto's pipeline shows the city has consistently "approved" over 30,000 units per year for five years, so approvals alone aren't the core issue. Rather, when a developer is ready to advance an "approval" to detailed execution and construction, delays stem from complicated processes required for responsible, efficient building in urban environments.

So, it's not just about approving projects faster – it's about executing them effectively. This often requires navigating complex logistical requirements like easements, agreements, and site-specific plans. This "execution problem" is a shared responsibility of both cities and applicants.

Provincial changes have pressured municipalities to tighten timelines, which has helped, but this must be balanced with robust reviews to support high-quality development. If municipal reviews are more targeted and scope-specific, focusing on what's relevant at each stage will prevent backlogs and align with development goals.

Misaligned policy and program methods across different levels of government further compound the complexity of Canada's housing crisis. While the federal government's interest in needs assessments can provide valuable insights, Ontario recently eliminated its requirement for needs assessments previously required to help evaluate employment land conversions. Without federal, provincial, and municipal policy coherence, housing initiatives won't be well-targeted to actual housing needs.

Historically, clearer responsibilities among government levels allowed for more efficient program delivery. Today, we need a renewed "hand-in-glove" approach that fosters alignment, clarifies roles, and streamlines coordination. The "who's in charge of what" issue must be addressed to ensure government initiatives effectively tackle the housing crisis.

Without multi-level government collaboration and a commitment to addressing demand and supply factors, meaningful housing progress will remain elusive.

Gregg Lintern is the Former Chief Planner and Executive Director, City Planning Division, City of Toronto (2017–2023) and a speaker at the C.D. Howe Institute's November 14, 2024 Conference on Housing Policy.

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